

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF H.R.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, H.R., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I was born in Washington, and currently live in Seattle, Washington. I have two  
5 children, who I co-parent with their father, W.R. I am a nurse and have been for many years.

6 3. I have chosen to submit this declaration using only initials because I am fearful  
7 that the government could retaliate against me or my child, or individuals emboldened by recent  
8 actions of the federal government would target my family for speaking out.

9 4. My youngest child is transgender. I have chosen to use a pseudonym and to refer  
10 to him in this declaration as "Minor A" because I am fearful for his and our family's safety and  
11 privacy in the current political climate. Minor A is currently 11 years old. He is very active and  
12 loves to play soccer in a recreational league on the boys' team. He is always getting outside to  
13 play with his friends, ride bikes, play baseball and likes to play videogames like Fortnite and  
14 Roblox with his friends. Though he's shy about it, he's also very creative, and is a talented at  
15 painting and drawing. When he was born, he was designated female on his birth certificate, but  
16 his gender identity is male.

17 5. During spring break in April 2021, Minor A told me he wanted to use they/them  
18 pronouns. A few weeks later he told me he wanted to use he/him pronouns, and that he wanted  
19 to present as a boy, and that he would prefer that I told his teacher. His father and I were surprised  
20 but were accepting. We have raised our children with an inclusiveness towards racial justice,  
21 sexual orientation and gender identity. W.R. told me that soon after this, he sat Minor A down  
22 and had a serious conversation, wanting to look him in the eyes and make sure he knew this was  
23 what he wanted and that he was fully serious. Ever since then, he has been our son, and everyone  
24 who knows him knows him as an upstanding young man. About a year after he came out, I asked  
25 him one day how he knew he was a boy. He paused and then responded wisely, "there was  
26 something there, but I didn't know what it was. And then I knew". Two sentences of wisdom, at

1 the age of nine, just like that. He has always been an old soul, a very wise kid. As a friend of  
2 mine put it, our children are our spiritual teachers. It is our job to listen and learn from our  
3 children, and I learn something new from my son every day. Since coming out, he has always  
4 been certain about his gender identity and how he wants to present to the world.

5 6. That following summer we supported Minor A in transitioning to present as a  
6 boy. We bought him boy clothes, including a lot of camouflage shorts that he wanted. He went  
7 with his dad to get his hair cut short. That fall, his teacher notified his class of the name he'd like  
8 to use and his pronouns, and since then it has been very smooth. His father and I feel lucky that  
9 our community is supportive of Minor A, so that he can just focus on being a kid and all the fun  
10 and growth that entails. Once he was presenting as a boy, it was clear that Minor A was happier  
11 and more confident. Many of my friends and our family mentioned soon after that he seemed  
12 much brighter, and more like himself. His father noticed a clear shift, from a family reunion  
13 where Minor A was withdrawn and quiet before his transition, to his clear and vocal excitement  
14 for life after getting his hair cut short, only a few months afterwards. In his own words, once he  
15 was able to present as a boy, "it felt like myself."

16 7. As Minor A has gotten older, we contacted a clinic for gender-affirming care to  
17 find out what is best for our child as he grows up. We have had a number of appointments at the  
18 clinic, where the providers there have spoken with us about Minor A's possibilities for future  
19 treatment, and discuss with me, his father and our son what our goals are for his health and  
20 puberty. This is not something we take lightly. We have done extensive research and spent a lot  
21 of time building a rapport with Minor A's medical providers before he has even begun showing  
22 signs of puberty. We understand that the decisions we make around gender-affirming care for  
23 our son will have lifelong and permanent impacts. As we considered different options including  
24 puberty blockers and hormone therapies, we had concerns about the consequences for Minor A's  
25 bone health and fertility. Even now, before any medication, Minor A drinks extra milk and takes  
26 calcium pills.

1           8.       Understanding all of this, we have decided, with the advice of Minor A's doctors,  
2 that the best option is to start Minor A on puberty blockers once he starts showing signs of  
3 puberty. It is crucial for Minor A to be able to present in a way that is true to himself, and not  
4 develop a female body. This path also prevents the need for invasive top surgery as an adult. A  
5 thorough aspect of his care will be to monitor his bone health as he ages. Many things have  
6 helped his father and I feel that this is the best choice for our son and our family. Minor A's  
7 medical providers have been incredibly supportive and help us be as informed as we can about  
8 the effect of different treatments, the risks, and the benefits. They emphasize that every child is  
9 unique, and they have been very patient as we ask many questions about gender-affirming care.  
10 They are continually kind, gentle, and professional. It has also helped for both me and his father  
11 to have long, honest, one-on-one conversations with Minor A about what he wants for himself,  
12 his identity, and his body. I keep a journal dedicated to the conversations I have with my son  
13 about his gender identity and his transition, so in a year, or five years, or twenty years, he can  
14 look back and understand how he felt and why we made the decisions we did. I consider it all a  
15 part of the beautiful story of how his life is unfolding.

16           9.       Before the presidential election in November, I became aware that there could be  
17 restrictions on gender-affirming care for youth from the upcoming presidential administration.  
18 In fact, all of 2024 I was distressed by this possibility. Gender-affirming care is a basic need for  
19 trans youth, akin to water, food, and housing. As a nurse, I've been blessed to work with trans  
20 patients and coworkers who I learned from even before my son came out as trans. Our son is on  
21 this path for care, and it is his right to receive the medical care that he, us as his parents, and his  
22 doctors all agree is the best option for him. I don't understand why the president should insert  
23 himself and presume to know what's best for a child better than their own parents. I think every  
24 parent loves their kid beyond measure and wants what is best for them.

25           10.      This last week, I became aware of an Executive Order putting conditions on  
26 gender-affirming care for youth. This is exactly the type of restrictions I was scared about. While

1 my son is not otherwise concerned about puberty, he is fearful of it if he could not access puberty  
 2 blockers. It would not be just disappointing for Minor A to go through female puberty, it would  
 3 be life-shattering. He has been living his life as a boy for years. Many people who have only met  
 4 him or our family in the last few years are not aware he is transgender. Being forced to undergo  
 5 female puberty would completely change his self-identity and how he presents in the world. It  
 6 would completely derail his life path. In his own words, "I want to live the life where I can be  
 7 who I want to be and live how I want to live. Not being able to have puberty blockers and  
 8 testosterone would be not just upsetting but devastating. We demand of our political leaders; Do  
 9 not take away the next generation's rights! We are the next generation, and we are the future -  
 10 Black people, Muslim people, Jewish people, trans people, gay people, queer people. You cannot  
 11 control us. We are not your robots; we are the future. You're the past. We are humans and we  
 12 are the future generations. We will speak our truth and nothing will stop that."

13 11. I would be very concerned if the restrictions in this executive order were to effect  
 14 medical providers in Washington. I want my son to be able to be a contributing and healthy  
 15 member of society, and this executive order seeks to prevent that. It is not a healthy society that  
 16 excludes anyone from healthy participation. That is not the world our family believes in, and not  
 17 the world we want to see.

18 I declare under penalty of perjury under the laws of the State of Washington and the  
 19 United States of America that the foregoing is true and correct.

20 DATED this 5<sup>TH</sup> day of February 2025.

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22 \_\_\_\_\_  
 23 H.R.  
 24 Parent of Minor A  
 25  
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